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October 30, 2012

Via ECF and First Class Mail  
Hon. Noel L. Hillman, U.S.D.J.  
United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

Re: Cambridge Management Group, LLC v.  
Horace Baker, et al.  
Civil Action No. 12-3577-NLH-AMD

Dear Judge Hillman:

I am the attorney for the Plaintiff, Cambridge Management Group, LLC ("CMG") regarding the above captioned matter. On October 26, 2012, Jonathan P. Vuotto, Esq., attorney for the Defendants filed a letter stating that CMG's Complaint to Compel Arbitration is now moot because the AAA advised the parties that the AAA is not accepting new consumer debt collection arbitration filings.

When Mr. Vuotto requested that CMG withdraw the Complaint to Compel my response, which is attached to Mr. Vuotto's letter, was that I was not going to withdraw the Complaint because the AAA will accept the demand to arbitrate in the event that there is a Court Order. I also advised Mr. Vuotto that I believe his request was frivolous given the position of the AAA and I advised him that I was act accordingly.

On Monday, October 29, 2012, after receiving notice of Mr. Vuotto's efileing, I wrote to Tara Parvey, the AAA representative who advised the parties that the AAA was closing the Baker arbitration file, and I asked Ms. Parvey to provide me a letter stating that the AAA would conduct the arbitration in the event that the Court ordered the arbitration.

Ms. Parvey wrote back to me, on October 29, 2012, at 1:23 pm, that the "AAA complies with court orders and the parties are requested to keep us updated with any developments. Our system is completely down so I am unable to draft any letters." (See attached email from Tara Parvey)

Clearly, the AAA will accept this arbitration in the event that the Court so orders it, as I advised Mr. Vuotto. Despite my statement to Mr. Vuotto that the AAA would comply with a court order, he proceeded to file this application. I consider such an application to be frivolous.

Please advise how the Court wishes to proceed in this matter. Thank you.

Respectfully submitted

A handwritten signature in dark ink, appearing to read "Raul J. Sloezen".

Raul J. Sloezen, Esq.

RJS/jks

Cc: Hon. Ann Marie Donio, (w/encl.)(via regular mail)  
Jonathan P. Vuotto, Esq. (w/encl.)(via email and regular mail)  
Rudolph V. De George, II, Esq. (via email only)



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**\*\*\*Document for Case: 18 513 00813 12**

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Tara Parvey <ParveyT@adr.org>  
To: Raul Sloezen <rjsloezen@gmail.com>

Mon, Oct 29, 2012 at 1:23 PM

AAA complies with court orders and the parties are requested to keep us updated with any developments.

Our system is completely down so I am unable to draft any letters.



**American Arbitration Association**

*Dispute Resolution Services Worldwide*

**Tara Parvey**  
**Director**

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**From:** Raul Sloezen [<mailto:rjsloezen@gmail.com>]  
**Sent:** Monday, October 29, 2012 11:04 AM  
**To:** Tara Parvey  
**Subject:** Re: \*\*\*Document for Case: 18 513 00813 12

Hi Tara

I realize you may not be in the office due to the storm however, it is imperative that I receive something from you asap that says that you will proceed with the arbitration if there is a court order. The other side has asked the

court to dismiss my case bcause your letter stating you are closing the file. Please get back to me asap.

Thanks

Raul

On Fri, Oct 26, 2012 at 4:18 PM, Raul Sloezen <rjsloezen@gmail.com> wrote:

Hi Tara

I have a request. The attorney for Baker has advised the court that the AAA is dismissing the case because you dont handle these anymore. However, you will do them with a court order. Could you please send me a letter which states that you will reopen the case if there is a court order? If you have any questions, please call me.

Thanks

Raul

On Thu, Oct 18, 2012 at 5:58 PM, Tara Parvey <ParveyT@adr.org> wrote:

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<http://www.adr.org>

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